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Nova Energy Limited  
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Gas Industry Company  
By email: [robert.gibson@gasindustry.co.nz](mailto:robert.gibson@gasindustry.co.nz)

## **Re: Nova Feedback on Amended and New Gas Information Exchange Protocols**

Nova Energy Limited (Nova) welcomes the opportunity to provide feedback on the amended and new Gas Information Exchange Protocols, in particular **GIEP8** and **GIEP12**. We acknowledge the intent of the changes and note that Nova has been anticipating these developments for some time and have been working to ensure operational readiness.

Our feedback below focuses on a small number of practical and implementation related matters where further clarification or refinement would assist participants and support efficient, automated compliance.

### **1. File Naming – Unique File Identifier**

The file formats specify that each file name includes a unique identifier. Nova seeks clarification on:

- Who is responsible for creating this unique identifier (e.g. the sending participant)?
- What mechanism or governance is proposed to ensure uniqueness across all participants, rather than only within a single organisation?
- Whether there are any constraints or expectations around sequencing, randomness, or re-use.

Clear guidance in this area would reduce the risk of file duplication or rejection across participants.

### **2. GIEP8 – File Detail and Data Requirements**

#### **a. Scope of Application**

It is unclear whether GIEP8 applies to all price category changes, including:

- Residential
- Commercial
- Industrial

Clarification on whether the protocol applies uniformly across these segments would be helpful.

## **b. Meter Type and SCMH Fields**

The requirement to submit meter type and SCMH for each meter raises practical concerns. Nova does not currently hold complete or consistently accurate values for these fields within our internal system (Orion).

We seek clarification on:

- Whether these fields may be left blank where the information is unavailable to the retailer; or
- Whether it is acceptable (or expected) that this data be sourced directly from the registry.

More broadly, if meter model or related detail is intended to become mandatory, Nova considers that:

- A corresponding field should be added to the registry; and
- Meter Equipment Providers (MEPs) should be required to maintain this information on an ongoing basis.

This would allow retailers to reliably access the data without needing to repeatedly request it directly from MEPs.

## **c. "Reason for Change" – Free Text Field**

The current specification identifies the Reason for Change field as a free-text field.

From an automation and consistency perspective, Nova requests consideration of:

- Providing a defined list of permissible reason codes or values; or
- Publishing a comprehensive reference list of expected reasons.

Without this, it will be difficult to automate GIEP8 processing across all scenarios while maintaining data quality and consistency.

## **3. GIEP12 – Price File Structure and Scope**

### **a. Definition of Group 3 and Above**

Nova requests clearer, network-specific definitions of Group 3 and above, based on each network company's own price category structures. Given the variability in network pricing methodologies, a standardised explanation or mapping would materially assist interpretation and implementation.

### **b. Definition of Groups 1 and 2**

Similarly, we seek clarification on the definition of Groups 1 and 2. It appears that residential and small commercial gas sites may not be required for inclusion in GIEP12 submissions.

If this interpretation is correct, clarification is requested on:

- Whether retailers are expected to receive pricing for these groups through a different channel; and
- If so, what that channel is and how it aligns with the objectives of GIEP12.

### **c. Intended Users of GIEP12**

Nova understands that GIEP12 is primarily applicable to network companies and is conceptually similar to the electricity EIEP12 pricing files provided by electricity networks to retailers. It would be useful if the GIC could clarify:

- Whether GIEP12 submissions are limited to network companies only; and
- How pricing information from meter owners is intended to be communicated, particularly where networks remain major meter owners.

Specifically, will MEP pricing be provided via GIEP12, separate gas protocol or an alternative communication channel?

### **d. Individually Priced LCOM and Industrial Sites**

Nova assumes that GIEP12 will include pricing for individually priced LCOM and industrial sites.

If so, we assume the price category field (e.g. "G12") would be replaced with an individual ICP identifier. In that case, the current Char(4) field length would be insufficient.

We suggest that this field length be expanded to accommodate ICP identifiers where individual pricing applies.

## **4. GIEP13 and Operational Readiness**

Nova confirms that, consistent with our electricity processes, we have for some time treated all gas GIEP13 requests in line with the five business day response requirement, and this will continue.

We currently have a database structure that allows us to supply consumption data efficiently, generate data for multiple ICPs simultaneously, and provide data based on either billed consumption or annualised usage. We will confirm that the output format aligns fully with GIC requirements.

The only capability not currently automated is the auto-download of GIEP13C files, similar to the existing EIEP13C process used for electricity. This is a technical enhancement we understand could be implemented, subject to final protocol specifications.

We appreciate the opportunity to provide feedback and would welcome further engagement on the clarification points raised, particularly where they affect data availability, automation, and consistent interpretation across industry participants.

Please do not hesitate to contact us if further detail would be helpful.

Yours sincerely,

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